

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION**

WINIFRED BLACKLEDGE

Plaintiff,

vs.

**ALABAMA DEPARTMENT OF
MENTAL HEALTH & MENTAL
RETARDATION & COMMISSIONER
JOHN HOUSTON, in his Official
Capacity as Commissioner.**

Defendants.

CASE No.: CV 2:06-CV-321-ID

PLAINTIFF'S EXHIBIT LIST

COMES NOW, Plaintiff Winnifred Blackledge and lists the following exhibits that may be used at the trial of this action:

1. PQA II List of Qualified Candidates September 7, 2002 (Bates # 0176) (Plaintiffs' Summary Judgment Response Exh. VV)
2. PQA II 2002 Job Announcement (Bates # 0001-0002)(Plaintiffs' Summary Judgment Response Exh. I)
3. PQA II 2002 Announcement to Daphne Rosalis (Bates # 0069 - 0070)(Plaintiffs' Summary Judgment Response Exh. J)
4. PQA II 2002 Interview Assessment Form (Bates # 0071)(Plaintiffs' Summary Judgment Response Exh. K)
5. June 16, 1999 Letter from Donna Buckley to Susan Stuardi (CSS II & III Positions) (Bates # 3935)
6. Memorandum 6/16/99 to Susan Stuardi from Kendra Butler (Bates # 3936)
7. October 15, 2001 Letter to Susan Stuardi from Winnifred Blackledge (#2)

8. Community Services Organization June 2002
9. CSS III Applicant Evaluation Form (Bates # 0434)
10. Community Services Specialist III Essential Job Functions (Bates # 0442)
11. CSS III Interview Questions (Bates # 0451-0453)
12. March 21, 2002 Letter to Fordyce Mitchell from Susan Stuardi (Staff Functions) (Bates # 3833 - 3834).
13. September 18, 2002 Letter to C&D's from Fordyce Mitchell (re: 04 Budget: new positions) (#3)
14. December 15, 2003 letter faxed on December 17, 2003 to Winnifred Blackledge from Marilyn Benson (ADMHMR) (#4)
15. December 15, 2003 Letter To Henry Ervin from Susan Stuardi (Bates # 0448 - 0449)
16. Applicants for CSS III Position (Bates # 0441)
17. Applicants for CSS III Position With Crossed-Out Names (Bates # 0391)(Plaintiffs' Summary Judgment Response Exh. H)
18. Letter from Susan Stuardi to Mitchell and Ervin (02/20/2004)(Re: alleged preselection)(Plaintiffs' Summary Judgment Response Exh. M)
19. Mildred "Mickey" Groggel Personnel File (Plaintiffs' Summary Judgment Response Exh. N)
20. Mickey Groggel Resume (Bates # 1729 - 1730)
21. Daphne Rosalis Personnel File
22. Winnifred Blackledge Personnel File
23. Announcement of CSS III Position (10/27/2003)(Plaintiffs' Summary Judgment Response Exh. O)(Bates # 00389)(Bates # 5441)(Bates # 0443)
24. Letter from Susan Stuardi to Levi Harris (12/13/2002) (Re: CSS III Position)(Plaintiffs' Summary Judgment Response Exh. P)(Bates # 0462)

- 25: Letter from Susan Stuardi to Levi Harris (12/16/2002) (Re: CSS III Position)(Plaintiffs' Summary Judgment Response Exh. Q)(Bates # 0461)
- 26: Winnifred Blackledge Letter (10/28/2003)(Re: CSS III Application)(Plaintiffs' Summary Judgment Response Exh. R)(Bates #1765)
- 27: Letter to Henry Ervin to Susan Stuardi (12/10/2003)(Re: CSS III Position given to Mickey Groggel)(Plaintiffs' Summary Judgment Response Exh. S)(Bates # 0446)
- 28: Letter to Winnifred Blackledge (12/15/2003)(Re; denial of CSS III position)(Plaintiffs' Summary Judgment Response Exh. T)
- 29: Plaintiff's Exh. U: CSS III Interview Panel Scoring Sheet (Bates # 3766) (Plaintiffs' Summary Judgment Response Exh. U)
- 30: Letter from Winnifred Blackledge to Susan Stuardi (7/12/2002)(Bates # 0466)(Plaintiffs' Summary Judgment Response Exh. V)
- 31: CSS III Position Applicant Assessment Forms (Plaintiffs' Summary Judgment Response Exh. UU)
- 32: Blackledge Complaint Form (12/15/2003)(Plaintiffs' Summary Judgment Response Exh. AAA)
- 33: E-mail From Susan Stuardi (01/21/2003) (Plaintiffs' Summary Judgment Response Exh. HHH)
- 34: Letter From Blackledge (Re; Job Duties)(Plaintiffs' Summary Judgment Response Exh. WW)
- 35: Response to Complaint (04/05/2004) (Bates # 3537 - 3562)(Plaintiffs' Summary Judgment Response Exh. XX)
- 36: Pre-Determination Interview conducted by Roy L. Jackson (EEOC) with Rebecca J. Luck June 27, 2005 (#1)(Bates # 04113)
- 37: Recommendation for New Desk Audit (Bates # 3513 - 3522; # 3524 - 3531)(Plaintiffs' Summary Judgment Response Exh. YY)
- 38: Letters regarding Desk Audit Findings (Bates # 3571 - 3582)
- 39: Procedure for Conducting Job Audits on Exempt Classifications (Bates # 5274 - 5287)

- 40: Blackledge Performance Appraisal March 2003 (Bates # 1582 - 1583)(Plaintiffs' Summary Judgment Response Exh. BBB)
- 41: Blackledge Performance Appraisal January 2001 (Bates # 4027 - 4030)(Plaintiffs' Summary Judgment Response Exh. CCC)
- 42: Blackledge Performance Appraisal January 2002 (Plaintiffs' Summary Judgment Response Exh. DDD)
- 43: Blackledge Performance Appraisal January 2003 (Plaintiffs' Summary Judgment Response Exh. EEE)
- 44: Blackledge Performance Appraisal January 2003 (2) (Plaintiffs' Summary Judgment Response Exh. FFF)
- 45: Blackledge Performance Appraisal January 2004 (Plaintiffs' Summary Judgment Response Exh. GGG)
- 46: Blackledge EEOC Charge (06/08/2004)(Plaintiffs' Summary Judgment Response Exh. RR)
- 47: EEOC Finding of Reasonable Cause and Conciliation Draft (07/01/2005)(Plaintiffs' Summary Judgment Response Exh. SS)
- 48: Letter to David Jackson (08/31/2005)(Plaintiffs' Summary Judgment Response Exh. TT)
- 49: Note from Jerry London regarding Winnifred Blackledge dated July 15, 2005 (Bates # 5216)
- 50: E-Mail from London to Mitchell December 22, 2005 (# 36)(Plaintiffs' Summary Judgment Response Exh. MM)
- 51: Notes dated June 19-20, 2006 (Bates # 5127)
- 52: Note (Bates Stamped # 5353)
- 53: Notes dated October 13, 2006 (Bates # 5138)
- 54: Attachment to Performance Appraisal January 4, 2004 (Bates # 4004-4002)(Plaintiffs' Summary Judgment Response Exh. JJ)
- 55: Blackledge Performance Appraisal December 2004 (36.3)(Corrected Copy)(Bates # 3366-3367)(Plaintiffs' Summary Judgment Response Exh. CC)

- 56: Blackledge Performance Appraisal December 2005 (35.7)(Bates #3362-3363)(Plaintiffs' Summary Judgment Response Exh. BB)
- 57: Blackledge Performance Appraisal December 2005 (28.6)(Plaintiffs' Summary Judgment Response Exh. DD)
- 58: Blackledge Performance Appraisal January 2006 (Bates # 4060-4061)(Plaintiffs' Summary Judgment Response Exh. Z)
- 59: Blackledge Mid-Appraisal July 26, 2006 (Bates # 4055-4057)(Plaintiffs' Summary Judgment Response Exh. AA)
- 60: Memorandum March 27, 2006; London transferred as Supervisor (# 41)(Plaintiffs' Summary Judgment Response Exh. EE)
- 61: Blackledge Mid-Appraisal June 26, 2006 (Bates # 4060-4061)(Plaintiffs' Summary Judgment Response Exh. II)
- 62: Blackledge Performance Appraisal January 6, 2007 (1/06/2007)(Plaintiffs' Summary Judgment Response Exh. NN)
- 63: Letter to Kathi Allen dated March 27, 1998 (Re; two-step increase because of Performance Appraisal)(Bates # 0544)
- 64: Memorandum from Winnifred Blackledge to Kendra Butler dated September 19, 2006 (#5)
- 65: Memorandum from Kendra Butler to Winnifred Blackledge dated September 19, 2006 (#6)
- 66: Memorandum from Winnifred Blackledge to Kendra Butler dated September 19, 2006 (#7)
- 67: Memorandum from Kendra Butler to Winnifred Blackledge dated September 28, 2006 (#8)
- 68: Memorandum from Winnifred Blackledge to Joan Owens dated October 16, 2006 (#9)
- 69: Memorandum from Winnifred Blackledge to Kendra Butler dated October 13, 2006 (#10-11)
- 70: Kendra Butler e-mail to Winnifred Blackledge dated April 21, 2006 with attached sign-in

sheet (#12-13)

- 71: Letter from Winnifred Blackledge to Henry Ervin dated January 26, 2007 (#14)
- 72: Memorandum from Jerryln London to Winnifred Blackledge, Donna Buckley, Jean Long dated May 27, 2006 (#15)
- 73: Memorandum from Winnifred Blackledge to Jerryln London dated April 12, 2006 (#16)
- 74: Memorandum from Winnifred Blackledge to Kendra Butler dated April 26, 2006 (Re; Discrimination Harassment, and Retaliation)(Plaintiffs' Summary Judgment Response Exh. GG; OO) (#18-19)(#103-104)(Bates # 4031-4032)
- 75: Attachment to Employee Performance Preappraisal dated July 26, 2006 (#20-21)
- 76: Letter from Winnifred Blackledge to Joan Owens dated March 22, 2006 (#22)
- 77: Letter from Winnifred Blackledge to Eranell McIntosh-Wilson dated March 21, 2006
Letter from Blackledge March 21, 2006 (Re; Complaint of harassment, discrimination and retaliation)(Bates # 4027 - 4030))(Plaintiffs' Summary Judgment Response Exh. Y; Exh. III)(#23 - 26)
- 78: Memorandum from Jerryln London to Winnifred Blackledge March 27, 2006 (Bates # 4025)(Plaintiffs' Summary Judgment Response Exh. X)
- 79: Memorandum from Winnifred Blackledge to Kendra Butler dated October 13, 2006 (#27-29)
- 80: Memorandum from Winnifred Blackledge to Joan Owens dated October 16, 2006 (# 30)
- 81: Letter from Kendra Butler to Winnifred Blackledge dated January 4, 2007 (Plaintiffs' Summary Judgment Response Exh. PP) (#31)
- 82: Letter from Winnifred Blackledge to Henry Ervin dated January 4, 2007 (Plaintiffs' Summary Judgment Response Exh. KK)(#32-35)
- 83: Letter from Kendra Butler to Winnifred Blackledge dated January 5, 2007 (#36)
- 84: Letter from Winnifred Blackledge to Henry Ervin dated January 9, 2007 (Bates # 4001-4009)(Plaintiffs' Summary Judgment Response Exh. LL) (#37 - 43)
- 85: Letter from Kendra Butler to Winnifred Blackledge dated January 12, 2007 (#44 - 45)

- 86: Letter from Kendra Butler to Winnifred Blackledge dated January 12, 2007 (re: Employee Performance Forms) (#46)
- 87: Letter from Winnifred Blackledge to Henry Ervin dated January 12, 2007 (Re; Discrimination Harassment, and Retaliation)(Bates # 4015)(Plaintiffs' Summary Judgment Response Exh. HH)(#47-48)
- 88: Letter from Winnifred Blackledge to Henry Ervin dated January 16, 2007 (Re; Discrimination Harassment, and Retaliation)(Plaintiffs' Summary Judgment Response Exh. FF)(#49-52)
- 89: Letter from Winnifred Blackledge to Henry Ervin dated January 26, 2007 (#53-54)
- 90: Letter from Winnifred Blackledge to Henry Ervin dated April 5, 2007 (#59)
- 91: Letter from Winnifred Blackledge to Kendra Butler dated April 5, 2007 (# 60-61)
- 92: Letter from Winnifred Blackledge to Henry Ervin, Fordyce Mitchell and Pat Martin dated May 3, 2007 (#62)
- 93: Letter from Winnifred Blackledge to Kendra Butler dated May 3, 2007 (#63-64)
- 94: Letter from Winnifred Blackledge to Kendra Butler dated May 4, 2007 (#65-66)
- 95: Letter from Winnifred Blackledge to Kendra Butler dated May 29, 2007 (#67)
- 96: Letter from Mamie Mackey to Jerrlyn London to Kendra Butler dated May 30, 2007 (#68)
- 97: Letter from Jerrlyn London to Winnifred Blackledge dated June 7, 2007 (#69)
- 98: Letter from Winnifred Blackledge to Jerrlyn London to dated June 13, 2007 (#70)
- 99: Letter from Winnifred Blackledge to Lori Leathers, Steve Lloyd, Cathy Smith, Yolanda Thomas dated June 13, 2007 (#71-73)
- 100: Letter from Winnifred Blackledge to Pat Martin dated June 25, 2007 (#74-75)
- 101: Letter from Winnifred Blackledge to Jerrlyn London to dated June 25, 2007 (#76-77)
- 102: Second EEOC Charge (Plaintiffs' Summary Judgment Response Exh. W)
- 103: Second EEOC Charge (Plaintiffs' Summary Judgment Response Exh. W)

- 104: January 9, 2007 Letter to EEOC and Charge of Retaliation / Discrimination
- 105: May 30, 2007 Notice of Discrimination / Retaliation Charge filed by EEOC (Bates # 5321 - 5322)
- 106: April 25, 2007 Letter to EEOC (Bates Stamped 5293 - 5305)
- 107: June 8, 2007 Letter from Ollie Croom from Courtney Tarver (Bates # 5325)
- 108: June 13, 2007 Letter to Ollie Croom and attached updated EEOC Charge
- 109: July 2, 2007 Letter to Winnifred Blackledge from Delner Thomas-Franklin regarding request for Right to Sue (Bates # 5324)
- 110: July 18, 2007 Notice of Right to Sue from Department of Justice
- 111: Affidavit of Eranell McIntosh-Wilson (Bates Stamped 5347 - 5352)
- 112: ADMHMR's policies and procedures relating to employment discrimination, including the defendant's policies and procedures regarding EEO compliance, retaliation, racial discrimination and racial harassment.
- 113: ADMHMR's Personnel Procedures Manual (Bates # 4159 - 4805)
- 114: ADMHMR's Policy on Performance Appraisal (Bates # 4274 - 4278)
- 115: ADMHR's Policy on Hours of Work (Bates # 4698 - 4709)
- 116: ADMHMR's Policy on Leave (Bates # 4235 - 4249)
- 117: ADMHMR's Personnel/Payroll Compensatory Time Policy
- 118: ADMHMR's Policy on Certifications (Bates # 4201-4207)
- 119: ADMHMR's Policy on Promotions (Bates # 4608 - 4625)
- 120: ADMHR's Policy on Selection of Candidates (Bates # 4808 - 4814)
- 121: ADMHMR's On The Job Harassment/Hostile Work Environment Policy (Plaintiffs' Summary Judgment Response Exh. ZZ) (Bates # 4921 - 4922)
- 122: ADMHMR's Personnel / Equal Employment Policy (Bates # 4923)

- 123: ADMHMR's Staff Development and Training Policy (Bates # 4924-4929)
- 124: ADMHMR's Employee Complaint Procedure (Bates # 4914 - 4920)
- 125: ADMHMR's policies and procedures relating to employee training regarding employment discrimination, including training related to EEO compliance, retaliation, racial discrimination and racial harassment.
- 126: The defendant's policies and procedures relating to employee discipline, including termination.
- 127: EEOC Charges of Discrimination Filed Against ADMHMR (Bates # 4077 - 4087)
- 128: EEOC Section 1983 Documents
- 129: Letter to Roy Jackson from Rebecca Luck (April 6, 2005) (Bates # 1733-1736)
- 130: Court Report of Black Applicants (Bates # 3613, 3606, 3601, 3598, 3594, 3591, 3588, 3583)(Plaintiffs' Summary Judgment Response Exh. QQ)
- 131: ADMHMR Labor Force Comparison (Bates # 4912)
- 132: Winnifred Blackledge Medical Records from Dr. Susan Blanchard marked Confidential
- 133: Letter from Dr. Susan Blanchard dated March 19, 2007 marked Confidential
- 134: Defendant's Responses to Plaintiff's First Interrogatories and Requests for Production (Plaintiffs' Summary Judgment Response Exh. L)
- 135: Complaint
- 136: First Amended Complaint
- 137: Notice of Deposition of Winnifred Blackledge (Bates # 5342 - 5345)
- 138. Any and all documents sent or identified in response to Plaintiff's discovery
- 139. Any and all documents sent or identified in response to Defendant's discovery
- 140. Any and all documents submitted to the EEOC
- 141. Any and all documents listed by Defendant and not objected to by Plaintiff.

- 142. Any and all documents or exhibits needed for rebuttal.
- 143. Any and all documents or exhibits needed for impeachment.
- 144. Deposition excerpts in this matter.
- 145. Plaintiff reserves the right to amend or supplement this exhibit list.

Respectfully submitted,

s/ Joshua D. Wilson

Rocco Calamusa, Jr.

Joshua D. Wilson

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OF COUNSEL

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CERTIFICATE OF SERVICE

I do hereby certify that on this the 5th day of October, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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